

Erik Wintzer

Transfer pricing for multinational enterprises. An integrated approach

Diploma Thesis

Transfer Pricing For Multinational Enterprises An Integrated Approach

OECD



Transfer Pricing For Multinational Enterprises An Integrated Approach:

Transfer Pricing for Multinational Enterprises: An integrated Approach Erik Wintzer, 2003 **Transfer Pricing and Multinational Enterprises** OECD, 1979-06-01 The OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations provide guidance on the application of the arm's length principle which is the international consensus on transfer pricing i.e. on the valuation for tax purposes of cross border transactions between associated enterprises In a global economy where multinational enterprises MNEs play a prominent role transfer pricing is high on the agenda of tax administrators and taxpayers alike Governments need to ensure that the taxable profits of MNEs are not artificially shifted out of their jurisdictions and that the tax base reported by MNEs in their respective countries reflect the economic activity undertaken therein For taxpayers it is essential to limit the risks of economic double taxation that may result from a dispute between two countries on the determination of an arm's length remuneration for their cross border transactions with associated enterprises Following this original 1979 publication the OECD Transfer Pricing Guidelines were approved by the OECD Council in their original version in 1995 A limited update was made in this 2009 edition primarily to reflect the adoption in the 2008 update of the Model Tax Convention of a new paragraph 5 of Article 25 dealing with arbitration and of changes to the Commentary on Article 25 on mutual agreement procedures to resolve cross border tax disputes A subsequent edition was released in 2010 in which Chapters I-III were substantially revised with new guidance on the selection of the most appropriate transfer pricing method to the circumstances of the case the practical application of transactional profit methods transactional net margin method and profit split method and on the performance of comparability analyses Furthermore a new Chapter IX on the transfer pricing aspects of business restructurings was added Consistency changes were made to the rest of the Guidelines Digitised document Electronic release on 24 11 2011 **OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022** OECD, 2022-01-20 In a global economy where multinational enterprises MNEs play a prominent role governments need to ensure that the taxable profits of MNEs are not artificially shifted out of their jurisdiction and that the tax base reported by MNEs in their country reflects the economic activity undertaken therein For taxpayers it is essential to limit the risks of economic double taxation **OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017** OECD, 2017-07-10 This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted in 2013 as well as the recent amendments made by the Reports on Actions 8 10 and 13 of the BEPS Actions Plan and conforming changes to Chapter IX **Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations** OECD, 2017-07-31 **Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations SET Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations - Binder+1999 Update** OECD, 1999-11-12 [OECD Transfer](#)

Pricing Guidelines for Multinational Enterprises and Tax Administrations 2009 OECD,2009-08-18 OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations provides guidance on the valuation for tax purposes of cross border transactions between associated enterprises **Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2001 Travel version** OECD,2001-06-26 The 2001 edition of Transfer Pricing Guidelines was substantially revised in July 2010 See the current edition This compact version of Transfer Pricing Guidelines provides the complete and current text of the OECD pricing guidelines accepted by *OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2010* OECD,2010-08-16 The OECD Transfer Pricing Guidelines provide guidance on the application of the arm's length principle which is the international consensus on transfer pricing the valuation for tax purposes of cross border transactions between associated enterprises *Integration Approaches to Group Taxation in the European Internal Market* Ioanna Mitroyanni,2008-10-13 The creation of a group taxation framework to subject affiliated entities resident in more than one EC Member State to a single set of rules is an experiment without precedent Group taxation normally deals with tax liability in the context of a single jurisdiction There is no system of group taxation worldwide which embraces more than one fiscal jurisdiction under a single regulatory umbrella This thought provoking work explores the prospect for creating a group taxation system extending across national borders in the EC The objective is to specify what shape the elements of such a system should take as well as to identify the areas of complexity or probable impasse Among the topics covered The relevant jurisprudential and legislative framework of the European Internal Market A survey of the tax systems of Canada Switzerland and the US with a focus on the principles pertaining to the division of power between the federal and sub federal tiers The policies for corporate taxation in integrated markets Administrative concerns compliance enforcement dispute resolution and re assessment of tax liability Tests for entitlement to group membership Tax base integration Territorial delineation of the group and Formulary apportionment In sum this book provides valuable insights into an area of significant importance to taxpayers their advisors and policymakers as well

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